

EXHIBIT 21

From: Heimer, Felicia E (OIG/OCIG) <Felicia.Heimer@oig.hhs.gov>
To: Lowney, Karen
CC: Michael Dearborn; Baldassano, Valli F.; James Rodenberg
Sent: 12/20/2011 9:50:25 PM
Subject: RE: Teva - Cephalon CIA Integration Proposal

Karen,

By this email, the OIG has reviewed and has no further questions regarding Teva's CIA Integration Proposal. We ask that Teva provide an update to the OIG on a quarterly basis, beginning on April 1, 2012, regarding its efforts to comply with CMS's reporting requirements under the Physician Payment Sunshine provisions of the Affordable Care Act.

Happy holidays,

Felicia Heimer

From: Lowney, Karen [mailto:klowney@cephalon.com]
Sent: Thursday, December 15, 2011 3:40 PM
To: Heimer, Felicia E (OIG/OCIG)
Cc: Michael Dearborn; Baldassano, Valli F.; James Rodenberg; Lowney, Karen
Subject: RE: Teva - Cephalon CIA Integration Proposal

Dear Felicia-

On December 14, 2011, the Centers for Medicare and Medicaid Services ("CMS") released the proposed Sunshine rule. Due to the timing of the publication of the proposed rule, a final rule will not be issued by January 1, 2012, and CMS will not require applicable manufacturers to begin collecting the required information until after the publication of the final rule. It further indicates that the agency is considering providing the industry a preparation period of 90 days from the date of publication of the final rule before requiring that necessary information be tracked – effectively, this would mean that manufacturers would not have an obligation to track expenditures until likely the third or fourth quarter of 2012 at the earliest. The agency is also considering whether it is even feasible to require collection of data for part of 2012, to be reported by the statutory date of March 31, 2013.

As a result, Teva is amending its CIA Integration Proposal submitted to you on November 14, 2011. The integration of Teva and Cephalon's aggregate spend systems and related processes has been of the utmost priority in preparation for the anticipated date of the Sunshine rule taking effect on January 1, 2012. Due the vast complexity of these systems and the uncertainty surrounding further definition of reporting requirements by CMS, we are proposing that US Teva/Cephalon-combined Phase II Reporting for CIA purposes be delayed until CMS requires collection of such data for the industry under the Sunshine rule. This will provide Teva with the opportunity to fully integrate all systems and help ensure accuracy and completeness of data.

Teva will continue to post on its website legacy Cephalon-related physician payments, in accordance with CIA Phase II Reporting requirements.

We appreciate your consideration of this proposal in light of recent events, and are happy to discuss in more detail at your earliest convenience.

Best regards-
Karen

Karen S. Lowney
Senior Director - Compliance
Teva Pharmaceuticals
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From: Lowney, Karen
Sent: Monday, November 14, 2011 7:43 PM
To: 'Felicia.Heimer@oig.hhs.gov'
Cc: Michael Dearborn; Lowney, Karen; Baldassano, Valli F.; James Rodenberg
Subject: Teva - Cephalon CIA Integration Proposal

Dear Felicia:

Pursuant to our discussion on October 24, 2011, attached you will find Teva's proposal for the integration of Cephalon's Corporate Integrity Agreement. The original was sent to you via Federal Express, which you should receive tomorrow.

If you have any questions, please feel free to contact me or Mike Dearborn (215-293-6566). Thank you for your consideration and we look forward to your response.

Best regards-
Karen

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